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March 29, 2018

CERTIFIED MAIL # 7017 2400 0000 6989 5295

U.S. Environmental Protection Agency, Region 8
Office of Enforcement, Compliance & Environmental Justice
Air Toxics and Technical Enforcement Program, 8ENF-AT
U.S. Environmental Protection Agency
1595 Wynkoop Street
Denver, Colorado 80202

RECEIVED

APR 3 - 2018

RE: XTO Energy Inc.

2017 Title V Annual Compliance Certification

Tap 5 Compressor Station

**Uintah County, UT** 

To Whom It May Concern:

XTO Energy, Inc. (XTO) respectfully submits the Title V Annual Compliance Certification covering calendar year of 2017. The report covers the Tap 5 Compressor Station (V-UO-000018-2007.00).

Attached are the Annual Compliance Certification form (a-comp), and the Certification of Truth, Accuracy, and Completeness (CTAC). Should you have any questions, please feel free to contact me at 817-885-6872 or via e-mail at ethan boor@xtoenergy.com.

Sincerely,

Ethan Boor

Environmental Engineer

XTO Energy Inc.



OMB No. 2060-0336, Approval Expires 05/31/2019

# Federal Operating Permit Program (40 CFR Part 71) CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official
Name: (Last)Herman (First)Timothy (MI)L
TitleXTO Energy Inc. Manager Midstream Operations
Street or P.O. Box810 Houston St
CityFort Worth State TX
Telephone (817) 885 – 2584 Ext Facsimile (817) 870 -8441
B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)
I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.  Name (signed)  Name (typed)  Timothy L. Herman  Date: _03/
Name (typed)Timothy L. Herman Date: _03//_ /201



OMB No. 2060-0336, Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)

ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

## A. GENERAL INFORMATION

Permit No. V-U0-000018-2007.00
Reporting Period: Beg.01 / 01 / 2017 End.12 / 31 / 2017
Source / Company NameTap 5 Compressor Station / XTO Energy Inc
Mailing Address: Street or P.O. Box 810 Houston St. PTR-4
City Fort Worth State_TX_ ZIP 76102
Contact person Ethan Boor Title Environmental Engineer
Telephone (817) 885 – 6872 Ext

Continued on next page

# **B. COMPLIANCE STATUS**

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer	
Permit Term (Describe requirements and cross-reference)  C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765)  1. Except as specified in §63.765(c), the Permittee shall comply with the applicable requirements for controlling air emissions specified in §63.765(b);	
Compliance Methods for the Above (Description and Citation):	
The glycol dehydration unit at the facility is controlled by a thermal oxidizer (closed vent system), and are designed and operated in accordance with the requirements of §63.771(c) and §63.771(d).	
Status (Check one): Intermittent Compliance _X Continuous Compliance	
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer	
Permit Term (Describe requirements and cross-reference)  C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765)  2. For each closed-vent system, the Permittee shall comply with the closed-vent system requirements specified in §63.771(c);	
Compliance Methods for the Above (Description and Citation):	
The closed-vent system at the facility meets the closed-vent system requirements of §63.771 (c). Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction.	
Status (Check one): Intermittent Compliance X Continuous Compliance	
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer	
Permit Term (Describe requirements and cross-reference)  C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765)  3. For each control device, the Permittee shall comply with the applicable control device requirements specified in §63.771(d) or §63.771(f);	
Compliance Methods for the Above (Description and Citation):	
The thermal oxidizer at the facility meets the requirements of §63.771(f). The control device as a manufacturer certification.	
Status (Check one): Intermittent Compliance X Continuous Compliance	

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

# C. Glycol Dehydration Unit Process Vent Standards [40 CFR 63.765)

4. - For each process modification made to comply with the glycol dehydration unit process vent standards at §63.765(c)(2), the Permittee shall comply with the process modification standards specified in §63.77l(e).

Compliance Methods for the Above (Description and Citation):

The thermal oxidizer at the facility is manufacturer certified and designed to meet a guaranteed 95% control efficiency while operating at a specified temperature range. XTO constantly monitors the TO temperature to ensure compliance. The facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature. The facility is in compliance with the process vent standards of §63.765(c)(2) and the modification standards of §63.77I(e).

Status (Ch	neck one):	Intermittent Compliance	_X Continuous Compliance
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Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

# D. Test Methods, Compliance Procedures, and Compliance Determination Requirements [40 CFR 63.772)

The Permittee shall determine compliance with the requirements of 40 CFR part 63, subpart HH using the applicable test methods and compliance procedures specified in §63.772.

Compliance Methods for the Above (Description and Citation):

A detectable emissions test procedure is conducted annually at the facility in accordance with Method 21, 40 CFR part 60, appendix A. XTO uses the applicable test methods and compliance procedures specified in §63.772.

Status (Check one): Intermittent Compliance	_X Continuous Compliance
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Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer

Permit Term (Describe requirements and cross-reference)

### E. Inspection and Monitoring Requirements [40 CFR 63.773)

1. For each closed-vent system or cover required for the Permittee to comply with 40 CFR part 63, subpart HH, the Pel mittee shall comply with the inspection and monitoring requirements specified in §63.773(c).

Compliance Methods for the Above (Description and Citation):

Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. The closed vent system

is inspected annually in accordance with Method 21, 40 CFR part 60, appendix A.
Inspections of the facility are completed semi-annually or more frequently, and maintenance/replacement of control device components is made as necessary. The facility is in compliance with the requirements of §63.773(c).
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  E. Inspection and Monitoring Requirements [40 CFR 63.773)  2. For each control device required for the Permittee to comply with 40 CFR part 63, subpart HH, the Permittee shall comply with the inspection and monitoring requirements as specified in §63.773(b) or §63.773(d).
Compliance Methods for the Above (Description and Citation):
Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. The closed vent system is inspected annually in accordance with Method 21, 40 CFR part 60, appendix A. Inspections of the facility are completed semi-annually or more frequently, and maintenance/replacement of control device components is made as necessary. The facility is in compliance with the requirements of §63.773(d).
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Status (Check one): Intermittent Compliance _X_ Continuous Compliance  Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.  Compliance Methods for the Above (Description and Citation):
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.  Compliance Methods for the Above (Description and Citation):  The facility complies with the recordkeeping requirements of 40 CFR part 63, subpart HH.
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  1. The recordkeeping provisions of 40 CFR part 63, subpart A that apply and those that do not apply to the Permittee are listed in Table 2 of 40 CFR part 63, subpart HH.  Compliance Methods for the Above (Description and Citation):  The facility complies with the recordkeeping requirements of 40 CFR part 63, subpart HH.  Status (Check one): Intermittent ComplianceX_ Continuous Compliance

The facility maintains the applicable records, as required in §63.774. Proper operational maintenance is monitored constantly with a thermocouple & the facility is inspected every other day.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  3. Except as specified in §§63.774(c), 63.774(d), and 63.774(f), the Permittee shall maintain the records specified in §63.774(b).
Compliance Methods for the Above (Description and Citation):
The facility maintains the applicable records, as required in §63.774.
Status (Check one): Intermittent Compliance X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  4. If compliance with the benzene emission limit specified in §63.765(b)(l)(ii) is elected, the Permittee shall document, to the Administrator's satisfaction, the items in §63.774(c).
Compliance Methods for the Above (Description and Citation):
Gylcol circulation rates are tracked on a daily inspection (every other day).
Status (Check one): _X Intermittent Compliance Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  5. For glycol dehydration units operating at the source that meet the exemption criteria in §63.764(e)(l)(i) or §63.764(e)(l)(ii), the Permittee shall maintain records as specified in §63.774(d).
Compliance Methods for the Above (Description and Citation):
The facility maintains the applicable records, as required in §63.774.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)

F. Recordkeeping Requirements [40 CFR 63.774]  6. The Permittee shall keep records of the requirements of §63.774(e) when using a flare
to comply with §63.771(d).
Compliance Methods for the Above (Description and Citation):
Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency
Status (Check one): Intermittent Compliance Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  7. The Permittee shall maintain records, pursuant to §63.774(g), of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.764(j), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
Compliance Methods for the Above (Description and Citation):
Vapors are routed to a thermal oxidizer, and the facility is automated to immediately stop circulating glycol during any periods that the thermal oxidizer is not operating at the required temperature for achieving 95% destruction efficiency. All periods of malfunctions or downtime are monitored and recorded along with the reason for the malfunction. Temperature readings are recorded every 15 minutes annually. The facility maintains records in compliance with §63.774(g).
Status (Check one): Intermittent Compliance X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  8. The Permittee shall keep records of the requirements of §63.774(h) when using a control device whose model is tested under §63.772(h) to comply with §§63.771(d), (e)(3)(ii) and (f)(l).
Compliance Methods for the Above (Description and Citation):
The facility is in compliance with the recordkeeping requirements of §63.774.
Status (Check one): Intermittent Compliance X Continuous Compliance

Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  F. Recordkeeping Requirements [40 CFR 63.774]  9. The Permittee shall keep records, pursuant to §63.774(i), of the date the semi-annual maintenance inspection required under §63.773(b) is performed when using a control device whose model was tested under §63.772(h).
Compliance Methods for the Above (Description and Citation):
Records are maintained in accordance with §63.774(i).
Status (Check one): _X Intermittent Compliance Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  1. The reporting provisions of subpart A of this part, that apply and those that do not apply to the Permittee are listed in Table 2 of this subpart.
Compliance Methods for the Above (Description and Citation):
The facility is in compliance with the reporting provisions of Table 2.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Status (Check one): Intermittent Compliance _X_ Continuous Compliance  Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).  Compliance Methods for the Above (Description and Citation):
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).  Compliance Methods for the Above (Description and Citation):  Reports for the facility are submitted in accordance with §63.775(b).
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).  Compliance Methods for the Above (Description and Citation):  Reports for the facility are submitted in accordance with §63.775(b).  Status (Check one): Intermittent ComplianceX Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).  Compliance Methods for the Above (Description and Citation):  Reports for the facility are submitted in accordance with §63.775(b).  Status (Check one): Intermittent ComplianceX Continuous Compliance  Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  3. The Permittee shall submit Notification of Compliance Status Reports as specified in
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  2. The Permittee shall submit the information specified in §63.775(b).  Compliance Methods for the Above (Description and Citation):  Reports for the facility are submitted in accordance with §63.775(b).  Status (Check one): Intermittent ComplianceX Continuous Compliance  Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  3. The Permittee shall submit Notification of Compliance Status Reports as specified in §63.775(d).

Status (Check one): Intermittent Compliance X_ Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  4. The Permittee shall submit Periodic Reports as specified in §63.775(e).
Compliance Methods for the Above (Description and Citation):  Periodic reports are submitted for the facility in compliance with §63.775(e).  Status (Check one): Intermittent ComplianceX Continuous Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  5. The Permittee shall submit notifications of process changes as specified in §63.775(f).  Compliance Methods for the Above (Description and Citation):  For any process changes, the facility will comply with the notification requirements of §63.775(f). No process modifications have been made.  Status (Check one): Intermittent Compliance
Emission Unit ID(s): Glycol Dehydrator & Thermal Oxidizer  Permit Term (Describe requirements and cross-reference)  G. Reporting Requirements [40 CFR 63.775]  6. The Permittee shall comply with any applicable electronic reporting provisions specified at §63.775(g).  Compliance Methods for the Above (Description and Citation):  Electronic reports are submitted in accordance with §63.775(g).  Status (Check one): Intermittent ComplianceX_ Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2  Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - C. Emission Limits and Operating Requirements  1. For engine units T5C-2 and T5BC-2, the permittee shall comply with the emission limitations for affected sources at a major source of HAP in Table 2a and the operating limitations in Table 2b of 40 CFR part 63, subpart ZZZZ as specified in §63.6600(b).

2. 4SLB stationary RICE	a. Reduce CO emissions by 93 percent or more; or
	b. Limit concentration of formaldehyde in the stationary RICE exhaust to 14 ppmvd or less at 15 percent $O_2$
Compliance Metho	ods for the Above (Description and Citation):
compliance with	re each operated with oxidation catalyst to control emission in Table 2a. Performance tests are conducted annually to ensure liance with the emission limitations required in this subpart.
Status (Check one	e): Intermittent Compliance _X Continuous Compliance
Emission Unit ID(s	s): T5C-2 and T5BC-2
NSPS ZZZZ - C.  1. For engine units T limitations in Table 2 a. maintain your comore than 2 inched drop across the cab. maintain the tentemperature is great Compliance Method Differential pressur compliance with T	Emission Limits and Operating Requirements 5C-2 and T5BC-2, the permittee shall comply with the operating 2b of 40 CFR part 63, subpart ZZZZ as specified in §63.6600(b). The pressure drop across the catalyst does not change by 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3c of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent from the pressure 3cd of water at 100 percent load plus or minus 10 percent load plus load plus load plus or minus 10 percent load plus
Emission Unit ID(s	s): RBU 11-2F PU
NSPS ZZZZ - C. 2. For engine unit RE affected sources at an	Emission Limits and Operating Requirements BU 11-2F PU, the permittee shall comply with the requirements for a area source of HAP in Table 2d and the operating limitations in R part 63, subpart ZZZZ as specified in §63.6603(a).
a. Change oil and fi	Iter every 2,160 hours of operation or annually, whichever comes first;1
b. Inspect spark plu necessary; and	gs every 2,160 hours of operation or annually, whichever comes first, and replace as
c. Inspect all hoses as necessary.	and belts every 2,160 hours of operation or annually, whichever comes first, and replace
Compliance Metho	ods for the Above (Description and Citation):
	an oil analysis program in order to extend the specified oil change bles 2c and 2d to this subpart. The oil analysis is performed at the same

frequency specified for changing the oil in Table 2c or 2d to this subpart

Status (Check one): X Intermittent Compliance Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2, RBU 11-2F PU
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - C. Emission Limits and Operating Requirements  3. For engine units T5C-2, T5BC-2, and RBU 11-2F PU, the permittee shall comply with the emission limitations, operating limitations, and other requirements in 40 CFR part 63, subpart ZZZZ at all times.
Compliance Methods for the Above (Description and Citation):
Subject engines at the Facility are in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR part 63, subpart ZZZZ at all times.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2  Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - C. Emission Limits and Operating Requirements  4. For engine units T5C-2 and T5BC-2, compliance with the numerical emission limitations for affected sources at a major source of HAP established in  40 CFR part 63, subpart ZZZZ shall be based on the results of testing the average of three (3) 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to 40 CFR part 63, subpart ZZZZ.  Compliance Methods for the Above (Description and Citation):  Subject engines at the Facility are in compliance with the emission limitations based on the results of testing requirements established in §63.6620 and Table 4 to 40 CFR part 63, subpart ZZZZ.  Status (Check one): Intermittent ComplianceX_ Continuous Compliance
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - C. Emission Limits and Operating Requirements  5. The Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.  The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the required levels have been achieved.  Determination of whether such operations and maintenance procedures are being used

will be based on information available to the EPA, which may include, but is not

limited to, monitoring results, review of operation and maintenance procedures, review
of operation and maintenance records, and inspection of the source.
Compliance Methods for the Above (Description and Citation):
Subject engines are operated and maintained , in a manner consistent with
safety and good air pollution control practices for minimizing emissions at all times.
Status (Check one): Intermittent Compliance X_ Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)
NSPS ZZZZ - D. Testing and Initial Compliance Requirements
1. For engine units T5C-2 and T5BC-2, the Permittee shall conduct the initial
performance tests or other compliance demonstrations requirements for affected
sources at a major source of HAP as specified in §63.6610.
Compliance Methods for the Above (Description and Citation):
Initial performance tests were conducted for the engines in accordance with §63.6610.
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Status (Charle and): V Intermittent Compliance Continuous Compliance
Status (Check one): X Intermittent Compliance Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Emission one is (5). 130-2 and 13BC 2
Permit Term (Describe requirements and cross-reference)
NSPS ZZZZ - D. Testing and Initial Compliance Requirements
2. For engine units T5C-2 and T5BC-2, the Permittee shall conduct subsequent performance tests as specified in § 63. 6615.
performance tests as specified in § 63. 6613.
Compliance Methods for the Above (Description and Citation):
Subsequent performance tests are performed as specified in § 63. 6615.
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Status (Chack and): Intermittent Compliance Continuous Compliance
Status (Check one): Intermittent Compliance Continuous Compliance
Emission Unit ID(a): TSC 2 and TSDC 2
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)
NSPS ZZZZ - D. Testing and Initial Compliance Requirements
3. For engine units T5C-2 and T5BC-2, the Permittee shall use the performance tests and
other procedures specified for affected sources at a major source of HAP in §63.6620.
Compliance Methods for the Above (Description and Citation):
Performance test procedures are completed in compliance with §63.6620 for all applicable

engines at the facility.
Status (Check one): Intermittent Compliance _X Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - D. Testing and Initial Compliance Requirements  4. For engine units T5C-2 and T5BC-2, the Permittee shall meet the monitoring, installation, collection, operation and maintenance requirements for affected sources at a major source of HAP as specified in §63.6625.
Compliance Methods for the Above (Description and Citation):
Subject engines at the facility meet the monitoring, installation, collection, operation and maintenance requirements for affected sources at a major source of HAP as specified in §63.6625
Status (Check one): Intermittent Compliance X Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - D. Testing and Initial Compliance Requirements  6. For engine units T5C-2 and T5BC-2, the Permittee shall demonstrate initial compliance with the emission limitations, operating limitations, and other requirements that apply to affected sources at a major source of HAP as specified in §63.6630.
Compliance Methods for the Above (Description and Citation):
Subject engines at the facility have demonstrated compliance with emission limitations, operating limitations, and other requirements that apply to affected sources at a major source of HAP as specified in §63.6630.
Status (Check one): Intermittent Compliance X Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - E. Continuous Compliance Requirements  1. For engine units T5C-2 and T5BC-2, the Permittee shall monitor and collect data to demonstrate continuous compliance as specified for affected sources at a major source of HAP in §63.6635.
(b) Must monitor continuously at all times that the stationary RICE is operating.
Compliance Methods for the Above (Description and Citation):
The subject engines at the facility are monitored in compliance with the requirements of

§63.6635.
Status (Check one): Intermittent Compliance X Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2, RBU II-2F PU
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - E. Continuous Compliance Requirements  2. For engine units T5C-2, T5BC-2 and RBU II-2F PU, the Permittee shall demonstrate continuous compliance with the emission limitations, operating limitations and other requirements as specified in §63.6640.
Compliance Methods for the Above (Description and Citation):
Subject engines demonstrate compliance in accordance with §63.6640.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - F. Notifications, Reports, and Records  1. For engine units T5C-2 and T5BC-2, the Permittee shall submit notifications as specified for affected sources at a major source of HAP in §63.6645.
Compliance Methods for the Above (Description and Citation):
Notifications are submitted as required in §63.6645.
Status (Check one): X_ Intermittent Compliance Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2, RBU II-2F PU
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - F. Notifications, Reports, and Records  2. For engine units T5C-2, T5BC-2 and RBU 11-2F PU, the Permittee shall submit reports as specified in §63.6650.
Compliance Methods for the Above (Description and Citation):
Reports for all engines are submitted as required in §63.6650.
Status (Check one): _X_ Intermittent Compliance Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2, RBU II-2F PU  Permit Term (Describe requirements and cross-reference)

NSPS ZZZZ - F. Notifications, Reports, and Records 3. For engine units T5C-2, T5BC-2 and RBU 11-2F PU, the Permittee shall keep records as specified in §63.6655.
Compliance Methods for the Above (Description and Citation): Records for all engines are maintained as required in §63.6655.
Status (Check one): Intermittent Compliance _X_ Continuous Compliance
Emission Unit ID(s): T5C-2 and T5BC-2, RBU II-2F PU
Permit Term (Describe requirements and cross-reference)  NSPS ZZZZ - F. Notifications, Reports, and Records  4. For engine units T5C-2, T5BC-2 and RBU 11-2F PU, the Permittee shall keep the records in the format and for the duration as specified in §63.6660.
Compliance Methods for the Above (Description and Citation):
Records are maintained in the required format as specified in §63.6660.
Status (Check one): Intermittent Compliance _X Continuous Compliance
Emission Unit ID(s):
Permit Term (Describe requirements and cross-reference)  IV. Facility-Wide Requirements [40 CFR 71.6(a)(l)]  A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]
1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants (HAPs) is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]
Compliance Methods for the Above (Description and Citation):
Records are maintained, as applicable, in accordance with recordkeeping requirements of [40 CFR 71.6(a)(3)(ii)]
Status (Check one): _X_ Intermittent Compliance Continuous Compliance
Emission Unit ID(s):
Permit Term (Describe requirements and cross-reference)  IV. Facility-Wide Requirements [40 CFR 71.6(a)(l)]

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A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]
2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.
Compliance Methods for the Above (Description and Citation):
Records are maintained for periods of 5 years or longer in electronic and/or hard copy format. Records are kept as required in [40 CFR 71.6(a)(3)(ii)].
Status (Check one): Intermittent ComplianceX_ Continuous Compliance
Emission Unit ID(s):
Permit Term (Describe requirements and cross-reference)  IV. Facility-Wide Requirements [40 CFR 71.6(a)(l)]  B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]
Compliance Methods for the Above (Description and Citation):
Compliance meaned for the Above (Costinguish and Chaden).
Facility is in compliance the reporting requirements of this Title V permit.
Facility is in compliance the reporting requirements of this Title V permit.
Facility is in compliance the reporting requirements of this Title V permit.  Status (Check one): _X_ Intermittent Compliance Continuous Compliance
Facility is in compliance the reporting requirements of this Title V permit.  Status (Check one): _X_ Intermittent Compliance Continuous Compliance  Emission Unit ID(s): ALL
Facility is in compliance the reporting requirements of this Title V permit.  Status (Check one): _X_ Intermittent Compliance Continuous Compliance  Emission Unit ID(s): ALL  Permit Term (Describe requirements and cross-reference)  V. General Provisions
Facility is in compliance the reporting requirements of this Title V permit.  Status (Check one): _X_ Intermittent Compliance Continuous Compliance  Emission Unit ID(s): ALL  Permit Term (Describe requirements and cross-reference)  V. General Provisions A- P

# C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a "possible exception to compliance." Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also, specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation:	
maintenance inspection required under §63.773(b)	

Emission Units (unit IDs): Thermal Oxidizer  Deviation Start// End://
Date Written Report Submitted/
Permit Term for Which There was a Deviation:
Emission Units (unit IDs):
Deviation Start//: End://:
Date Written Report Submitted/
Permit Term for Which There was a Deviation:
Emission Units (unit IDs):
Deviation Start/ : End:// :
Date Written Report Submitted/
Permit Term for Which There was a Deviation:
Emission Units (unit IDs):
Deviation Start/: End://
Date Written Report Submitted/

## INSTRUCTIONS FOR A-COMP ANNUAL COMPLIANCE CERTIFICATION

#### Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

### **DETAILED INSTRUCTIONS**

Submit this form along with a certification of truth, accuracy and completeness by a responsible official on an annual basis.

### Section A (General Information)

Name and address should be consistent with information provided previously. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or other individual, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

The reporting period must be at least every 12 months, but your permit may require this more frequently.

# Section B (Compliance Status)

<u>Description of Permit Term</u>: Include each permit terms that imposes a requirement or action (emission limitations, standards, monitoring, recordkeeping, reporting, and other requirements on one or more emission units or on the facility. You will likely have to complete this section numerous times to include all requirements in the permit.

The emissions unit ID(s) should be those defined in the permit or in section I of form GIS. If the requirements, including compliance methods, apply in the same way to multiple emission units, you may list multiple units for a particular requirement. Emission units and requirements may be grouped if they apply the same way at all units in the group, the same compliance methods apply to all, and all units have the same compliance status.

Citations to the requirements should unambiguously identify the permit term to the lowest level.

<u>Compliance Methods</u>: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the permit term described above. Also, describe and cross-reference these compliance methods.

To describe monitoring, indicate the monitoring device, what is being monitored, averaging time, frequency, and cross-reference the permit term. To describe recordkeeping, describe the records kept, collection frequency, and cross-reference the permit term. Please indicate if monitoring data results or compliance records are kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cross-reference the permit term.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level.

Compliance Status: For each permit requirement and its associated compliance methods, indicate whether there was intermittent or continuous compliance (check one) during the reporting period. You should consider all available information or knowledge that you have when evaluating this, including compliance methods required by the permit and "credible evidence" (e.g., non-reference test methods and information "readily available" to you). You are always free to include written explanations and other information to clarify your conclusion regarding compliance status.

You must include permit terms that were not effective or not applicable (e.g., future-effective requirements, compliance options, and alternative scenarios). You may certify to continuous compliance for these if there is no evidence of noncompliance.

Absent evidence to the contrary, you may certify continuous compliance based on the data provided by the compliance methods, provided you did not fail to perform them and there were no unexcused deviations. Any failure to meet any permit term for any period of time indicates intermittent compliance. You may also indicate "undetermined compliance," if you include the reason.

## Section C (Deviations From Permit Terms and Conditions)

Summarize all deviations from permit terms that occurred since the last compliance certification. They may have been reported previously in-writing or they may be reported concurrently with this certification. Also include any deviations but have not yet been reported in writing.

Copy this page as many times as necessary to include all deviations that occurred during the reporting period for this compliance certification.

Deviations occur when any permit term is not met, including emission limitations, standards, monitoring, recordkeeping, reporting and other requirements. For a more detailed explanation of the term "deviation." See the instructions for Form *SIXMON*. A deviation is not necessarily a violation. Violations are determined by EPA (or its delegate Agency).

You may cross-reference deviations previously reported (e.g., in 6-month monitoring reports).

You must indicate whether each deviation is a "possible exception to compliance." This is a deviation that occurs when compliance is required. A deviation that is not a "possible exception to compliance" is one that occurs when compliance is not required or it is excused by another permit term. If you indicate that a deviation is not a possible exception to compliance, briefly explain and cross-reference the permit term that allows or excuses it. In addition, deviations for which the permit provides an affirmative defense (e.g., emergencies) must be identified as "possible exception to compliance" because only the permitting authority may determine if the affirmative defense applies.

If the cross-reference a deviation report that does not contain all the information requested here, you must supplement it accordingly.

You may list multiple emission units if they all had the same deviation during the same time periods. In addition, for deviations that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter facility-wide in the emissions unit column.

You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time.

Specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written deviation report during the reporting period covered by the sixmonth monitoring report (whether required to do so or not). It is a deviation to fail to submit a required deviation report.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form CTAC and attach it to this annual compliance certification.